

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MICHAEL DELAVEGA,)
Plaintiff,)
v.)
AMDOCS, INC.,)
Defendant.)
No. 3:13-cv-00706

CONSENT MOTION TO AMEND SCHEDULING ORDER

COME NOW the Parties in the above-captioned action, pursuant to the Orders of the Court on November 20 and 24, 2014 and the Case Management Conference of February 24, 2015, and respectfully request that the Scheduling Order in this matter be amended as set forth below. In support of this Motion, the Parties state the following:

1. The Parties are, and have been, actively engaged in discovery.
2. Pursuant to discussions between the Parties and the Court during the Case Management Conference held on February 24, 2015 wherein the prospect of additional time needed to complete discovery was raised, the Parties respectfully request the Court to amend the deadlines as set out below:
 - (a) All fact discovery shall be completed by **April 30, 2015**. Any written discovery shall be served in time for the responses to be due before this deadline.
 - (b) Any dispositive motion shall be filed by **June 4, 2015**. A response shall be filed within **21 days** after the filing of the motion and, in any event, no later than **June 25, 2015**. An optional reply, limited to **five pages**, may be

filed within **14 days** of the filing of the response and, in any event, no later than **July 9, 2015**.

(c) The trial date shall be **November 10, 2015** per the Court's Order of November 24, 2014 [Doc. 35].

Respectfully submitted this 13th day of March 2015,

**HALL, ARBERY, GILLIGAN, ROBERTS &
SHANLEVER LLP**

By /s/ David Allen Roberts

David Allen Roberts, Esq.
Georgia Bar No. 608444 (pro hac vice)
3340 Peachtree Road, N.E.
Suite 1900
Atlanta, GA 30326
Telephone: (404) 442-8776
Facsimile: (404) 537-5555
droberts@hagllp.com

GILBERT RUSSELL MCWHERTER PLC

Michael L. Russell, Esq.
Tennessee Bar No. 20268
5409 Maryland Way, Suite 150
Brentwood, Tennessee 37027
Telephone: (615) 354-1144
mrussell@gilbertfirm.com

Attorneys for Plaintiff Michael De la Vega

SO ORDERED:

John Bryant USM

THOMPSON COBURN LLP

By /s/ Paul R. Klein (w/ consent)

Laura M. Jordan, Esq.
Missouri Bar No. 48755 (pro hac vice)
Paul R. Klein, Esq.
Missouri Bar No. 63005 (pro hac vice)
One US Bank Plaza
St. Louis, Missouri 63101
Telephone: (314) 552-6000
Facsimile: (314) 552-7000
ljordan@thompsoncoburn.com
pklein@thompsoncoburn.com

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

Ben Bodzy, Esq.
Tennessee Bar No. 023517
211 Commerce Street, Suite 800
Nashville, Tennessee 37201
Telephone: (615) 726-5640
Facsimile: (615) 744-5640
bbodzy@bakerdonelson.com

Attorneys for Defendant Amdocs, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Laura M. Jordan, Esq.
Paul R. Klein, Esq.
One US Bank Plaza
St. Louis, Missouri 63101

Ben Bodzy, Esq.
211 Commerce Street, Suite 800
Nashville, Tennessee 37201

/s/ David Allen Roberts